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July 12, 2017

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***VIA E-MAIL***

The Honorable Magdeline D. Coleman  
United States Bankruptcy Judge  
for the Eastern District of Pennsylvania  
Robert N.C. Nix Sr. Federal Courthouse  
900 Market Street, Suite 202  
Philadelphia, PA

**Re: Barry Portnoy, Case No. 14-16081-mdc**

Dear Judge Coleman:

I am writing to request a conference to address a threat by Mr. Kaskey, counsel for debtor, to report me to the Disciplinary Board for certain unspecified alleged misconduct relating to the case currently pending before Your Honor.

Late Monday afternoon, I returned a telephone message from Mr. Kaskey. The call began as a discussion of an agreed-to order counsel were to submit to Your Honor.

Mr. Kaskey then proceeded to allege that I had misrepresented facts to Your Honor during several oral arguments in this case going back to the fall of 2016. In each instance, Your Honor granted a request for relief against debtor over the objection of Mr. Kaskey.

During the call, Mr. Kaskey repeatedly asserted that he would file a complaint with the Disciplinary Board unless I retracted my alleged misrepresentations. Mr. Kaskey would not, however, identify the alleged misrepresentations.

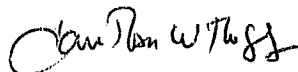
I believe that Mr. Kaskey is impermissibly using the threat of disciplinary action against me to gain advantage for his client, unfairly prejudice my client, and interfere with the litigation of this case. Especially in the context of the lawsuit Mr. Kaskey's client filed against me personally, Mr. Kaskey's threat is calculated to chill my advocacy and undermine my credibility, with the objective of having factors other than the merits influence the outcome of this case.

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I absolutely deny that I made any misrepresentations at any time. However, if Mr. Kaskey contends that I did then he should raise the matter with Your Honor in the first instance and give me a chance to respond. I therefore respectfully request that Your Honor hold an in person conference or teleconference with counsel to address this matter.

Respectfully,



Jonathan W. Hugg

For SCHNADER HARRISON SEGAL & LEWIS LLP

JWH

cc: (Via E-Mail)

John Kaskey, Esquire ✓  
Gary Seitz, Esquire  
Holly Smith, Esquire  
Al Belmont, Esquire  
Kevin Callahan, Esquire